

# EXHIBIT 2

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1 Q. And was that all that you saw on fire outside  
2 the house?  
3 A. No. There was also a stump right next to the  
4 shed that was on fire.  
5 Q. Okay.  
6 A. It's -- like, it was like a chair stump  
7 because it looked like a chair.  
8 Q. Okay.  
9 A. So we turned it into a chair basically.  
10 Q. Okay. And was that right next to the shed,  
11 the stump?  
12 A. Yes.  
13 Q. Okay.  
14 A. It was the shed would be right here. It would  
15 be like right there or right there. I don't remember if  
16 it was there or there. I knew it was one -- in one of  
17 those two locations.  
18 Q. Okay. So the shed would've been outside of  
19 your bedroom window; right?  
20 A. Yes.  
21 Q. Okay. And then the stump would've been near  
22 the shed?  
23 A. Yes, it was right next to the shed in one way.  
24 It was either out facing this way or out facing that  
25 way.

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1 Q. Okay. So it was on one side of the shed, you  
2 just don't really remember for sure?  
3 A. Yes.  
4 Q. Okay. So aside from the set -- shed, front  
5 porch, and stump, that was all that you saw on fire  
6 outside the house?  
7 A. Yes.  
8 Q. Okay. And you had mentioned Ryan coming to  
9 the house at some point. And is Ryan -- do you know  
10 Ryan's last name? Is it Mr. Pasborg?  
11 A. Yes.  
12 Q. Okay. And have you seen Ryan since the fire?  
13 A. Yes. Multiple times.  
14 Q. Okay. Do you know how long it was when --  
15 from when you went outside the house until Ryan came?  
16 A. No longer than four or five minutes.  
17 Q. Okay.  
18 A. But no less than 30 seconds.  
19 Q. Okay. And did you, **K.W.** and **L.W.** did  
20 you stay over by the tree until Ryan came?  
21 A. Yes. When he came, we stayed by the tree  
22 until he told us to go get in his truck.  
23 Q. Okay.  
24 A. Which was after he had already got both **W.W.**  
25 and Mom out of the fire.

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1 Q. Okay. So when Ryan went into the house to get  
2 **W.W.** and your mom out of the fire, did you **L.W.** and  
3 **K.W.** stay over by the tree?  
4 A. Yes. We stayed on the driveway where it was  
5 still -- when it was still frozen.  
6 Q. And when Ryan was getting **W.W.** and your mom,  
7 did you guys stay by the tree?  
8 A. We stayed in the area that we had been  
9 waiting.  
10 Q. Okay. So the same area you stayed in?  
11 A. Yes.  
12 Q. All right. And then when **W.W.** and your mom  
13 came out with Ryan, is that when you got into Ryan's  
14 truck?  
15 A. After he performed CPR and revived my mom,  
16 that's when we got into the truck.  
17 Q. Okay. Prior to getting into the truck, had  
18 you, **K.W.** and **L.W.** always stayed over by the tree -  
19 the driveway by the tree area?  
20 A. Yeah.  
21 Q. Okay.  
22 A. At first, we were on the concrete that's just  
23 about there. And we backed up because it was getting a  
24 little bigger really quickly.  
25 Q. Okay. So there was a concrete area outside of

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1 your garage; right?  
2 A. Yes.  
3 Q. Okay. And then further away from the house is  
4 when it was the driveway, which was not concrete; right?  
5 A. Yes. The driveway would be like right there.  
6 Q. Okay.  
7 A. And it was frozen solid. It was half-an-inch  
8 thick.  
9 Q. Okay. So the driveway would've been next to  
10 the garage?  
11 A. Yes.  
12 Q. And that's where you backed away to --  
13 A. Yeah.  
14 Q. -- during the fire?  
15 A. Correct.  
16 Q. Okay. Do you recall speaking with any of the  
17 investigators after the fire?  
18 A. I remember having a brief conversation with  
19 somebody in the medic that I was going to be, like, I  
20 was like, are they going to be okay? What? And I was  
21 also confused. Because **W.W.** looked like he had no  
22 wounds at all.  
23 Q. Okay. And **W.W.** ended up having some burns,  
24 right?  
25 A. Yes.

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1 Q. Okay.  
 2 A. On his leg, his hand, and his back.  
 3 Q. Okay. Do you remember any of the  
 4 conversations that you had with any of the fire  
 5 department or police department people that came?  
 6 A. It was only the medics that I had a  
 7 conversation with, but other than that, I don't  
 8 remember.  
 9 Q. Okay. Do you remember speaking with an  
 10 individual named Detective Sheaman at some point?  
 11 A. Recently, like in the past from the fire or  
 12 past until now or?  
 13 Q. After the fire?  
 14 A. Directly after it or?  
 15 Q. It would've been shortly after it, yes.  
 16 A. No, I do not. But I do remember speaking with  
 17 a detective about two or three months -- no more about  
 18 four or five months after the fire.  
 19 Q. Okay. Is that when you would've gone down to  
 20 the sheriff's office and met with him there?  
 21 A. Yes.  
 22 Q. Okay. Is that the only time you remember  
 23 speaking with the Detective Sheaman?  
 24 A. I remember when were -- were in Cheyenne with  
 25 -- while we were visiting Ryan -- well, when he was

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1 getting his award from the governor, I remember talking  
 2 to him there a little bit.  
 3 Q. Okay.  
 4 A. But other than, I don't remember talking to  
 5 him again.  
 6 Q. Okay. Was the only time that you talked to  
 7 Detective Sheaman about the fire and what you saw, was  
 8 that when you were at his office?  
 9 A. Yes.  
 10 Q. Okay. Do you remember speaking with any other  
 11 investigators that were investigating the fire?  
 12 A. No.  
 13 Q. Okay. Just Detective Sheaman that you  
 14 remember?  
 15 A. Yes. I remember one investigator.  
 16 Q. Okay.  
 17 A. It's -- I didn't -- I never got his name,  
 18 though.  
 19 Q. Okay.  
 20 A. So that might be a totally different  
 21 detective.  
 22 Q. Okay. And you just remember speaking to one  
 23 investigator though?  
 24 A. Yeah.  
 25 Q. All right. When you woke up -- or when you

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1 first woke up in the fire, it was L.W. voice that  
 2 woke you up as opposed to any smoke alarms; right?  
 3 A. Yes.  
 4 Q. Okay. At some point, did you hear smoke  
 5 alarms go off?  
 6 A. Yes, I did.  
 7 Q. But the smoke alarms weren't going off when  
 8 you first woke up; right?  
 9 MR. AYALA: Form.  
 10 THE WITNESS: They were.  
 11 BY MR. LAFLAMME:  
 12 Q. They were?  
 13 A. Yes, they were. But I do not -- I don't  
 14 remember if they were going off before I woke up  
 15 because --  
 16 Q. Okay. You just remember waking up from  
 17 L.W. voice?  
 18 A. Yes.  
 19 Q. Okay. Did you get hurt at all in the fire?  
 20 A. No. Other than maybe one degree burn on my  
 21 back, but that's --  
 22 Q. Okay. Did -- do you have any limitations or  
 23 problems --  
 24 A. No.  
 25 Q. -- now?

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1 A. No, I do not.  
 2 Q. Okay. You can wrestle okay?  
 3 A. Yeah.  
 4 Q. Did you do any other sports besides wrestling?  
 5 A. No. Oh, football.  
 6 MR. AYALA: He got the stern look from Mom.  
 7 Does she take you to practices?  
 8 THE WITNESS: Yes.  
 9 MR. AYALA: Okay. So she knows.  
 10 BY MR. LAFLAMME:  
 11 Q. What position do you play in football?  
 12 A. It was flag football, so we would switch --  
 13 Q. Okay.  
 14 A. -- positions.  
 15 Q. Are you a running back? You look like you  
 16 might be a running back. Do you know what position that  
 17 is?  
 18 A. I was only running back once or twice.  
 19 Q. Okay.  
 20 A. But I was good at it when I got it.  
 21 Q. So was this flag football through school?  
 22 A. It was through a program.  
 23 Q. Okay. Do you remember what your team name  
 24 was?  
 25 A. We didn't have a team name.

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1 fire?  
2 A. Yes. It was melting from the top down.  
3 Q. Okay. By the way the porch being on fire, is  
4 that the same porch you still have today at your house?  
5 A. Yes.  
6 Q. Okay. And you said those are the only three  
7 things that you saw on fire outside?  
8 A. Yes.  
9 Q. Okay. So you didn't see the roof on fire, you  
10 didn't see a nearby tree on fire; right?  
11 A. Yes.  
12 Q. Okay. Right, I'm right?  
13 A. Yeah.  
14 Q. Okay. You didn't -- go ahead.  
15 A. I did forget one thing. There was like a  
16 plastic bowl thing with a dog, where we would keep our  
17 dog water in and that was slightly on fire, but it  
18 wasn't no more than this tiny one.  
19 Q. Okay. And where was that located?  
20 A. That was right next to the shed and wall by  
21 the window.  
22 Q. Okay. All right. But you didn't see any  
23 other part of the house wall on fire?  
24 A. No.  
25 Q. On the outside?

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1 A. I did not.  
2 Q. Okay. Did you ever have nightmares about that  
3 night or that morning?  
4 A. Yes.  
5 Q. Do you still have them?  
6 A. No, I do not.  
7 Q. Was there a time where you were having them  
8 and eventually it kind of went away?  
9 A. There was a time where I would have one, it  
10 would be like -- directly after the fire, it'd would be  
11 one, one night, the -- the next night I had no dreams at  
12 all, next night, I had it. And then it went like from  
13 that to got less and less and less. I actually did have  
14 one, like a month or two ago, but it was no more just  
15 the little right after we had -- at the -- it was at the  
16 one -- it was at the old, old -- the old house, the  
17 rental. But my sister bakes cookies and she forgot to  
18 clean out the bottom, so it had to gotten on fire and a  
19 couple of weeks later, I had a nightmare of that  
20 catching on fire. But other than that, I have not had  
21 it.  
22 Q. Okay. All right. Are there times where you  
23 still see or smell fire and it brings back those  
24 memories?  
25 A. No.

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1 Q. Okay. Good. How old are you today?  
2 A. 10.  
3 Q. So you would've been how old when this  
4 happened?  
5 A. 8.  
6 Q. How old was your brother, L.W.  
7 A. 6.  
8 Q. Okay. How about W.W.  
9 A. 4. K.W. was like 12.  
10 MR. AYALA: Right. Okay. I think that's it,  
11 bud. Thanks for your time.  
12 THE WITNESS: You are welcome. I like playing  
13 with the platypus.  
14 MR. AYALA: Yes. I was going to ask you if  
15 that was a platypus. Good job.  
16 THE REPORTER: Just before we go off the  
17 record, we're going to read and sign again?  
18 MR. AYALA: Yes, ma'am.  
19 THE REPORTER: Okay. And then we both want  
20 electronic transcripts for this deposition.  
21 MR. LAFLAMME: That'd be great.  
22 THE REPORTER: Thank you.  
23 MR. LAFLAMME: Thank you.  
24 THE REPORTER: We are going off the record. The  
25 time is 1:03 p.m.

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1 (DEPOSITION CONCLUDED AT 1:03 P.M. MT)  
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